

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

THOMAS M. KELLEY,

Plaintiff,

v.

TOWN OF PLYMOUTH, et al.,

Defendants.

C.A. NO. 05-10596-NMG

**OFFICE OF THE INSPECTOR GENERAL’S MOTION FOR LEAVE
TO FILE AN AFFIDAVIT BY HAND AND NOT ELECTRONICALLY**

Pursuant to Local Rule 5.2 and 7.1, the Office of the Inspector General (the “IG”) respectfully requests leave to file by hand, and not electronically, a copy of the Affidavit of Barbara J. Hansberry (“Affidavit”), dated December 20, 2006. On August 9, 2007, the IG and the plaintiff Thomas Kelley filed a Joint Stipulation And Proposed Order To Produce Affidavit And Proposed Order For The Protection Of Confidential Material (“Stipulation and Proposed Orders”), which references the Affidavit. The Stipulation and Proposed Orders state that the IG remains concerned that the Affidavit contains confidential information. See M.G.L. c. 12A, § 13. Thus, the IG respectfully request that this Court allow the Affidavit to be filed by hand in order to preserve its confidentiality.

For the foregoing reasons, the IG’s Office respectfully requests that this Court allow it to file the Affidavit by hand and not electronically.

Respectfully submitted,

OFFICE OF THE
INSPECTOR GENERAL,

By its counsel,

MARTHA COAKLEY
ATTORNEY GENERAL

/s/ Christine Baily

Christine A. Baily, BBO #643759
Assistant Attorney General
Government Bureau
One Ashburton Place, Room 2014
Boston, Massachusetts 02108
(617) 727-2200, extension 2617

August 9, 2007

CERTIFICATION PURSUANT TO LOCAL RULE 7.1

Pursuant to Local Rule 7.1(a)(2), I hereby certify that I have conferred with Attorney Joseph R. Gallitano, counsel to the plaintiff Thomas M. Kelley, regarding this motion. I have called but could not reach Attorney Jeremy I. Silverfine, counsel to the defendants, Robert J. Pomeroy and the Town of Plymouth, before the filing of this motion.

/s/ Christine Baily

Christine A. Baily, BBO #643759
Assistant Attorney General

August 9, 2007